

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE: BARD IVC FILTERS PRODUCTS
LIABILITY LITIGATION

MDL Case No. 2:15-MD-02641-DGC

This Document Relates to:

Individual Civil Case #2:18-cv-00969-DGC

VERNISHA HERBERT, Plaintiff

**PLAINTIFF'S MOTION TO
WITHDRAW AS COUNSEL**

On March 28, 2018, the undersigned counsel filed a Short Form Complaint on behalf of Plaintiff, Vernisha Herbert, alleging personal injuries sustained by the Plaintiff after implantation of an IVC Filter product manufactured by Defendants. Subsequent to filing of Plaintiff's lawsuit, however, Plaintiff hired other counsel. Based on this, the undersigned attorney, Douglass A. Kreis, respectfully requests that he be permitted to withdraw from her case. Plaintiff will continue to be represented by attorney, Kevin Klein, who will file a notice of appearance in this matter.

Dated: June 19, 2018

Douglass A. Kreis
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By: /s/ Douglass A. Kreis

I hereby certify that on this 19th day of June, 2018, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing, and mailed a true and correct copy of the foregoing via electronic, and USPS to Kevin Klein, Esq., Rosenbaum & Rosenbaum, P.C., at 100 Wall Street, 15th Floor, New York, NY 10005, kk@rosenbaumnylaw.com.

/s/ Douglass A. Kreis